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5 Attorney for Material Witnesses
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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10 (Honorable Louisa A. Porter)

11 UNITED STATES OF AMERICA,)	CASE NO. 08CR0543
)	08MJ8140
12 Plaintiff,)	
13 vs.)	DECLARATION OF THOMAS G. GILMORE
)	IN SUPPORT OF MOTION FOR
14 Mariano Garcia-Barrera,)	VIDEOTAPE DEPOSITION AND
)	SUBSEQUENT VOLUNTARY DEPORTATION
)	OF MATERIAL WITNESSES
15)	
)	DATE: May 8, 2008
16 Defendant.)	TIME: 2:30 p.m.
)	PLACE: Courtroom of Magistrate
17		Louisa A. Porter

18 I, Thomas G. Gilmore declare:

19 I am an attorney duly licensed to practice before all the
20 courts of this State, District and Circuit, and am the attorney of
21 record for the material witnesses in the above action, Constantino
22 Escamilla-Ortiz, Antonio Valenzuela-Gonzalez, Guillermo Mata-Valles
23 and Alcelmo Sanchez-Salazar.

24 I have personal knowledge of the facts set forth in this action
25 and could testify competently thereto if called.

26 My clients in this action have been in federal custody since
27 February 14, 2008 because they cannot locate anyone to post bond for
28 them.

1 My clients entered the United States to find work to support
2 family members at home in their country of origin. Each day they
3 remain in custody is an additional hardship on themselves and their
4 families.

5 Based on the above it respectfully requested that this motion
6 be granted, that said depositions take place at the earliest
7 possible time, and that my clients be allowed to voluntarily return
8 home to their country of origin immediately thereafter.

9 I declare under the penalty of perjury under the laws of the
10 State of California that the foregoing is true and correct of my own
11 personal knowledge except as to those matters stated to be based
12 upon information and belief and, as to those matters, I am informed
13 and believe that they are true and correct.

14 Executed this 30th day of April, 2008, in San Diego,
15 California.

16 /ss/ Thomas G. Gilmore
17 THOMAS G. GILMORE, Attorney for
18 Material Witnesses
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